

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011

Docket No. N2011-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO DAVID POPKIN INTERROGATORIES DBP/USPS-73 AND 76**

The United States Postal Service hereby provides institutional responses to the above-listed interrogatories of David Popkin dated September 9, 2011. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

DBP/USPS-73

Please refer to your Library Reference USPS-LR-N2011-1/12 and the corresponding non-public version NP7.

- [a] Please explain how the distances were calculated.
- [b] Is the distance shown the distance FROM the facility being discontinued TO the replacement facility or is it the reverse? There appears to be different distances due to one way streets,
- [c] If the nearest replacement office was originally calculated using airline distances, has it been reevaluated to see that it is still the nearest facility when the distances have been converted to driving distances? If not, why not?
- [d] I have checked two entries in the Library Reference using www.mapquest.com and I arrived at different distances than shown in the Library Reference.
Englewood Annex 07631 [55 Smith Street] to Englewood Main Office 07631 [77 Engle Street] = Mapquest 1.17 / 1.26 reverse miles / Library Reference 0.9 miles
River Road Fair Lawn 07410 [12-44 River Road] to Fair Lawn Main Office 07410 [14-24 Abbott Road] = Mapquest 1.11 miles / Library Reference 0.1 miles.
Please explain the discrepancy for these two entries and please discuss the validity of the remaining entries.

RESPONSE

- (a) Through the utilization of readily available mapping resources such as www.uspswhitepages.com, driving atlases, or local postal records.
- (b) No records have been maintained to indicate whether the calculation in each case was from A to B or from B to A.
- (c) As numerous interrogatory responses have made clear, the "as the crow flies" distance was used solely for the purpose of creating the pools of station, branch and annex candidates that are part of the ROA Initiative.

For purposes of facility-specific USPS Handbook PO-101 discontinuance

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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RESPONSE TO DBP/USPS-73 (continued)

review, driving distance will be used to determine the proximity of the retail location nearest the one being studied for discontinuance. Accordingly, no purpose would be served by seeing how that latter distance might compare to the former distance.

- (d) Different mapping software programs -- such as MapQuest, Google and Microsoft Bing -- calculate driving distances using different methodologies and, therefore, can produce different estimates of distance between the same points. The fact that one might use Mapquest, for example, to produce driving distance estimates for two origin-destination points that vary from those produced by Bing, for example, validates this observation.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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DBP/USPS-76 In the hearing before the United States Senate Committee on September 6, 2011, the Postmaster General stated several times that the revenue cutoff for use in the current Docket was \$20,000 rather than the \$27,500 figure that was previously provided by the Postal Service. Does this require the filing of updates by the Postal Service as required by the Commission's Rules? If not, what was the significance of his testimony?

RESPONSE

No update is required by any Commission rule under the circumstances. The significance of that aspect of the Postmaster General's Congressional testimony is that it proves, despite carrying the weight of the postal world on his shoulders, that like his predecessors, he is a mere mortal and does not have perfect recall of every bit of postal minutiae at the tip of his tongue twenty four hours a day.